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ASSOCIATION OF FLIGHT ATTENDANTS-CWA, AFL-CIO



GLOBAL BUSINESS TRAVEL ASSOCIATION

November 19, 2015

Tom Wheeler  
Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Received & Inspected  
NOV 23 2015  
FCC Mail Room

Dear Chairman Wheeler:

We are writing to express our concern regarding a proposal by the FCC to expand communications infrastructure in commercial aviation prior to a careful review of the proposal with the intelligence community and other concerned stakeholders.

We are concerned that the FCC appears to be moving towards finalizing the proposed GN Docket No. 13-114 air-ground mobile broadband service proposal *before* the conduct and completion of a study that we believe should be led by the intelligence community, namely the Office of the Director of National Intelligence (ODNI), which would initiate and manage an interagency cyberterrorism committee. Such a committee would analyze current threats and vulnerabilities, categorize threats and vulnerabilities based on future progression of technologies, identify potential solutions, and recommend regulations and standards.

ODNI has the capabilities to coordinate and lead an inter-agency initiative to analyze potential risks to the security of our nation's commercial aviation system. Their intelligence mission requires consideration of activities and processes anywhere in the world that might lead, directly or indirectly, to risks to U.S. national security. Although the FCC would be a necessary part of the committee, it naturally does not have the depth of appreciation and study of vulnerabilities, risks and threats that make the intelligence community best suited to lead it.

Especially in light of the recent horrific events in France, Beirut, and Egypt, we think the intelligence community needs to lead such a high-level committee with the appropriate Federal agencies, including the military, and industry stakeholders, in order to conduct a thorough assessment of existing and potential threats and vulnerabilities, and develop and evaluate appropriate risk reduction measures as necessary, prior to consideration of whether or not to finalize the rule proposed in GN Docket No. 13-114.

Sincerely,

Sara Nelson  
International President  
Association of Flight Attendants-CWA, AFL-CIO

Michael W. McCormick  
Executive Director and Chief Operating Officer  
Global Business Travel Association

cc: David Simpson

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